UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

MISSOURI STATE CONFERENCE OF)
THE NATIONAL ASSOCIATION FOR)
THE ADVANCEMENT OF COLORED)
PEOPLE, ET AL.,)
)
Plaintiffs,)
v.) No. 4:14-cv-02077-RWS
FERGUSON-FLORISSANT SCHOOL)
DISTRICT and ST. LOUIS COUNTY)
BOARD OF ELECTIONS)
COMMISSIONERS,)
Defendants.)

Motion for Attorneys' Fees and Non-Taxable Costs

Come now Plaintiffs, pursuant to 42 U.S.C. § 1988 and 52 U.S.C. § 10310(e), and for the reasons set forth in the accompanying memorandum in support of this motion and supporting documentation request this Court award Plaintiffs' attorneys' fees and non-taxable expenses. As explained and documented in Plaintiffs' memorandum, the lodestar for attorneys' fees to date in this case is \$1,476,952.75; however, use of a modified lodestar of \$1,137,920.05 is appropriate here. Plaintiffs' non-taxable expenses should be awarded in the voluntarily reduced amount of \$232,320.43.

Respectfully submitted,

/s/ Anthony E. Rothert ANTHONY E. ROTHERT, #44827MO ACLU of Missouri Foundation 454 Whittier Street St. Louis, Missouri 63108 Phone: (314) 652-3114

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2016, I filed the foregoing document using the e-

filing system, thereby serving electronic copies via email to all named parties below:

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